



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

OCT 24 2016

Earl F. Moran
ExxonMobil Refining and Supply
Global Remediation
2203 Timberloch Place, No. 213
The Woodlands, TX 77380

Re: Administrative Order on Consent, RCRA Section 7003
Luis Muñoz Marin International Airport
Docket No. RCRA-02-2012-7305
Conditional Approval of Subsurface LNAPL Recovery Plan

Dear Mr. Moran:

The July 2013 Subsurface LNAPL Recovery Plan submitted to the U.S. Environmental Protection Agency (EPA) by Arcadis Puerto Rico on behalf of the Respondents to the above-referenced Order on Consent (AOC) is hereby conditionally approved upon inclusion of the following revisions:

- 1) Revise the Health and Safety Plan (Appendix B) to provide for vacuum truck exhaust to be placed downwind from workers, and to require that a multi-gas meter (PID, LEL, O₂, CO and H₂S) be utilized in the breathing zone to continuously monitor air quality during all work conducted pursuant to the AOC.
- 2) Revise Section 4.2.2, Paragraph 4, as follows:
 - a. Delete text: "If Phase I tests are successful in quantifying NSZD rates, Phase II will implement the testing in the Terminal D and Terminals B/C LNAPL plumes."
 - b. Insert text: "Following completion and evaluation of the Phase I testing in the fuel tank farm area, the test methods and results shall be reviewed in light of recent and ongoing advances in NSZD science to determine an appropriate method, subject to EPA's written approval for implementation at the LMMIA, for NSZD assessment across all three LNAPL zones at the site."
- 3) Revise Section 5.1.2, Paragraph 1, and Section 5.1.3 to provide for semiannual monitoring for the first two years and annual monitoring thereafter until cessation of the long term monitoring program is approved by EPA.

The revised Subsurface LNAPL Recovery Plan shall be submitted to EPA within thirty days of receipt of this letter, and implementation shall thereafter commence pursuant to the schedule in the revised Plan.

Please call me at (212) 637-4039 if you have any questions regarding this matter.

Sincerely yours,



Leonard Grossman
Project Coordinator

cc:

Rafael Mullet, Esq.
Toro, Colon, Mullet, Rivera & Sifre, P.C.
Union Plaza, Suite 311
416 Ponce de Leon Avenue
San Juan, Puerto Rico 00918-3430

Deny Gomez
Principal Program Manager
Shell, Soil & Groundwater FDG
ATTN: JLM
250 Muñoz Rivera Ave. 8th Floor
San Juan, Puerto Rico 00918

Miguel L. Torres-Torres, Esq.
Law Offices
P.O. Box 191064
San Juan, Puerto Rico 00919-1064

Milagros Rodriguez Castro
Project Manager,
Environmental Compliance,
Occupational Safety
Puerto Rico Ports Authority
P.O. Box 362829
San Juan, Puerto Rico 00936-2829

Brian W. Curtis
General Counsel
Environmental Management Co.
Chevron Corp.
6001 Bollinger Canyon road (T.2228)
San Ramon CA 94583

Jerry Lucas-Marrero, Esq.
O'Neill & Borges, LLC
American International Plaza, Suite 800
250 Munoz Rivera Avenue
San Juan, Puerto Rico 00918-1813

Braulio Garcia-Jimenez, Esq.
Torres & García, P.S.C.
P.O. Box 19539
San Juan, Puerto Rico 00910-1539

Ivanska Merced
Chevron Environmental Management Co.
4800 Fournace Place (E524D)
Bellaire, TX 77401

Jorge R. Suárez Pérez-Guerra, PE
Assistant Executive Director for
Planning, Engineering and Construction
P.O. Box 362829
Puerto Rico Ports Authority
San Juan, Puerto Rico 00936-2829

Peter Lacko
Chevron Environmental Mgmt. Co.
9119 Corporate Lake Dr., Suite 150
Tampa, FL 33634